

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MICHAEL CONTI,

Plaintiff,

v.

CORPORATE SERVICES GROUP, INC.,
and JAY LEON,

Defendants.

CASE NO. C12-245RAJ

VERDICT FORM

We, the jury, answer the questions that the court submitted as follows:

QUESTION 1

Did CSG discriminate against Mr. Conti on the basis of race or national origin in violation of Washington law?

YES

☒

NO

☐

Please answer Question 2.

QUESTION 2

Did CSG discriminate against Mr. Conti on the basis of race or national origin in violation of federal law?

YES

☒

NO

☐

If you answered "YES" to Question 2, please answer Question 3. If you answered "NO" to Question 2, please skip Question 3 and answer Question 4.

VERDICT FORM – 1

1 **QUESTION 3**

2 Would CSG have taken the adverse employment action or actions you found to be
3 discriminatory in answering Question 2 even if Mr. Conti's race and national origin had
4 played no role in CSG's decision to take the action or actions?

5 YES ☒

6 NO ☐

7 *Please answer Question 4.*

8 **QUESTION 4**

9 Did CSG discriminate against Mr. Conti on the basis of age in violation of
10 Washington law?

11 YES ☐

12 NO ☒

13 *Please answer Question 5.*

14 **QUESTION 5**

15 Did CSG retaliate against Mr. Conti in violation of Washington law?

16 YES ☐

17 NO ☒

18 *Please answer Question 6.*

19 **QUESTION 6**

20 Did CSG retaliate against Mr. Conti in violation of federal law?

21 YES ☐

22 NO ☒

23 *Please answer Question 7.*

QUESTION 7

Did Jay Leon discriminate against Mr. Conti on the basis of race or national origin in violation of Washington law?

YES ☒

NO ☐

Please answer Question 8.

QUESTION 8

Did Jay Leon discriminate against Mr. Conti on the basis of race or national origin in violation of federal law?

YES ☒

NO ☐

If you answered "YES" to Question 8, please answer Question 9. If you answered "NO" to Question 8, please skip Question 9 and answer Question 10.

QUESTION 9

Would Jay Leon have taken the adverse employment action or actions you found to be discriminatory in answering Question 8 even if Mr. Conti's race and national origin had played no role in his decision to take the action or actions?

YES ☒

NO ☐

Please answer Question 10.

QUESTION 10

Did Jay Leon discriminate against Mr. Conti on the basis of age in violation of Washington law?

YES ☐

NO ☒

Please answer Question 11.

QUESTION 11

Did Jay Leon retaliate against Mr. Conti in violation of Washington law?

YES

NO

☒

Please answer Question 12.

QUESTION 12

Did Jay Leon retaliate against Mr. Conti in violation of federal law?

YES

NO

☒

If you answered "YES" to any of Questions 1-12, please answer Question 13. If you answered "NO" to all of Questions 1-2, 4-8, and 10-12, please do not answer any other questions; sign and date this form and notify that the court that you have reached a verdict.

QUESTION 13

Please write the amount of damages that you find Mr. Conti has proven were proximately caused by Defendants, minus any amount that Defendants have proven Mr. Conti could have avoided by mitigating his damages:

A. reasonable value of lost earnings and

fringe benefits through June 2012: \$ 20,160

B. emotional harm:

\$ 170,625.12

Please answer Question 14.

QUESTION 14

If you found Jay Leon liable for any violation of the law (that is, if you answered "YES" to any of Questions 7-8 or 10-12) please write the amount of damages from the amount you entered in response to Question 13 that you find Mr. Conti has proven were proximately caused by Mr. Leon. If you did not find Jay Leon liable for any violation of law, please do not answer this question.

A. reasonable value of lost earnings and

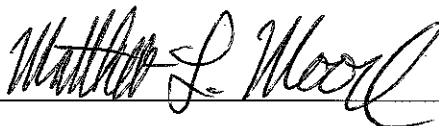
fringe benefits through June 2012: \$ 0

B. emotional harm:

\$ 10,000

Please sign and date this form, and notify the court that you have reached a verdict.

Dated December 12, 2013



Signature of Presiding Juror